



RANDY HAYS 1/2/2019

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4	EXAMINATION BY MR. ROTHERT .....	7
5		
6	(No exhibits marked.)	
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12 DEPOSITION OF RANDY HAYS, produced,  
13 sworn, and examined on Wednesday, January 2, 2019  
14 taken on behalf of the Plaintiff, at the offices of  
15 American Civil Liberties Union of Missouri, 906  
16 Olive Street, Suite 1130, in the City of St. Louis,  
17 State of Missouri, before RENEE COMBS QUINBY, a  
18 Certified Court Reporter (MO), Certified Shorthand  
19 Reporter (IL) #084-004867, Certified Shorthand  
20 Reporter (CA) #11867, Registered Diplomate Reporter,  
21 Certified Realtime Reporter, and a Notary Public  
22 within and for the State of Missouri.

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1 A P P E A R A N C E S

2

3 FOR THE PLAINTIFF:

4 Anthony E. Rothert, Esq.  
American Civil Liberties Union of Missouri  
5 906 Olive Street, Suite 1130  
St. Louis, MO 63101  
6 (314) 652-3114  
arothert@aclu-mo.org

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9 FOR THE DEFENDANT:

10 Abby Duncan, Esq.  
St. Louis City Counselor's Offices  
11 1200 Market Street, Room 314  
St. Louis, MO 63103-2806  
12 (314) 622-4620  
duncana@stlouis-mo.gov

13

14

15 ALSO PRESENT: Nicole Strombom

16

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20 COURT REPORTER:

21 RENEE COMBS QUINBY, RDR, CRR  
Missouri CCR #1291  
22 Illinois CSR #084-004867  
California CSR #11867  
23 Alaris Litigation Services  
711 North 11th Street  
24 St. Louis, MO 63101  
(800) 280-3376

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1 --oOo--

2 IT IS HEREBY STIPULATED AND AGREED by and  
3 between counsel for the Plaintiff and counsel for  
4 the Defendant, that this deposition may be taken in  
5 machine shorthand by RENEE COMBS QUINBY, a Certified  
6 Court Reporter and Notary Public, and afterwards  
7 transcribed into typewriting, and the signature not  
8 waived by agreement of Counsel and consent of the  
9 Witness.

10 --oOo--

11 RANDY HAYS,  
12 of lawful age, having been first duly sworn to  
13 testify to the truth, the whole truth, and nothing  
14 but the truth in the case aforesaid, deposes and  
15 says in reply to oral interrogatories propounded as  
16 follows, to-wit:

17 P R O C E E D I N G S 8:34 a.m.

18 --o0o--

19 MR. ROTHERT: Good morning. It is  
20 January 2nd, 2019, and my name is Tony Rothert and  
21 you're --

22 THE WITNESS: Randy Hays.

23 MR. ROTHERT: Okay. Randy Hays is here  
24 pursuant to a subpoena for testimony. The City  
25 Counselor's Office is not here yet. It is 8:34. I

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1     **anything you would do differently today?**

2             A.     On the advice of counsel, I'm asserting  
3     my Fifth Amendment right.

4             **Q.     Are you aware of the preliminary**  
5     **injunction that was entered in this case, Ahmad**  
6     **versus City of St. Louis?**

7             A.     No.

8             MR. ROTHERT:   I have no further  
9     questions.

10            MS. DUNCAN:   No, I have no questions.

11            THE REPORTER:   Did you want a copy?

12            MS. DUNCAN:   Sure.

13                    (Whereupon, signature was not  
14                    waived and the witness was  
15                    excused at 9:19 a.m.)

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